

**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF GEORGIA
COLUMBUS DIVISION**

TODD BLACKBURN, and)	
SAMANTHA BLACKBURN,)	
)	
Plaintiffs,)	
)	
vs.)	CIVIL ACTION
)	
)	FILE NO: 4:11-CV-00039
BANK OF AMERICA)	
CORPORATION,)	
)	
Defendant.)	

**CONSENT MOTION TO ADD AND DROP
PARTIES AND TO AMEND COMPLAINT**

COME NOW PLAINTIFFS and, pursuant to Fed. R. Civ. P. 21, respectfully request that the Court add BAC Home Loans Servicing, LP as a defendant to this case and drop Bank of America Corporation as a defendant. Counsel for Bank of America Corporation and BAC Home Loans Servicing, LP has consented to this Motion.

The originally named Defendant, Bank of America Corporation, is a holding company, not a bank, and is not a proper party to this lawsuit. The parties agree that the proper defendant to this action should be BAC Home Loans Servicing, LP, which Plaintiffs allege was the servicer of Plaintiffs' home loan at the relevant times of the facts alleged in Plaintiffs' Complaint.

Additionally, Plaintiffs respectfully request, and Defendants have consented in writing pursuant to Fed. R. Civ. P. 15(a)(2), leave to file their First Amendment to Complaint in order to reflect the change in party defendants if the Court grants the above motion to drop and add parties.

This 11th day of July, 2011.

Respectfully submitted,

CHARLES A. GOWER, P.C.

/s/ Charles A. Gower
CHARLES A. GOWER
Georgia Bar No. 303500
TERESA T. ABELL
Georgia Bar No. 000383
MIRANDA J. BRASH
Georgia Bar No. 475203

1425 Wynnton Road
P. O. Box 5509
Columbus, GA 31906
(706)324-5685

Consented to by:

/s/ Andrew G. Phillips
ANDREW G. PHILLIPS
Georgia Bar No. 575627
MCGUIRE WOODS, LLP
1230 Peachtree Street, NE
Promenade II, Suite 2100
Atlanta, Georgia 30309-3534
(404) 443-5724 (telephone)
(404) 443-5773 (facsimile)
Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that I have this date electronically filed Plaintiffs' "Consent Motion to Add and Drop Parties and to Amend Complaint" with the Clerk of Court using the CM/ECF system which will automatically send e-mail notification of such filing to the following attorneys of record:

Andrew G. Phillips, Esq.
McGuire Woods LLP
1230 Peachtree Street, N.E.
Promenade II, Suite 2100
Atlanta, GA 30309-3534

This 11th day of July, 2011.

s/ Charles A. Gower
CHARLES A. GOWER
Georgia Bar No. 303500

1425 Wynnton Road
P.O. Box 5509
Columbus, Georgia 31906
(706) 324-5685